

IN THE CIRCUIT COURT OF THE STATE OF OREGON  
FOR THE COUNTY OF MARIONKirk Alexander Vasquez

Case No. 6:24-cv-01920-MK

v. under 12.5m  
 Marion County Jail, MCJ Health  
 Services, MCJ Health Department of Health  
 Services, MCJ Health Services, Deputy Felix Gottlieb  
 services, Deputy Erica Cruz, (unname) Larson  
 Deputy Douglas, Deputy Cruz, (unname) Larson  
 Hwy 58  
 Hwy 58  
 Salem, OR 97317

On or about on 10-03-24 approx 2:30 pm Plaintiff Kirk Alexander Vasquez  
 was directed to go to a pathfinders class, upon arrival to where the  
 media control room was located Vasquez unexpectedly slipped. This  
 fall extremely injured his knee, back, shoulder and head immediately  
 causing blurred vision and dizziness. In the proximity of this  
 accident there were no warning signs or any other suggestion  
 that may require all to proceed with caution. From this  
 day forward Vasquez continued to struggle physically. After  
 the fall Plaintiff made known to Deputy Douglas all issues that  
 occurred, twice. After countless hours of agonizing and  
 pleading with officials medical administered a knee compr-  
 ssion Ace tube and medication. (See medical charges via Kere  
 -70 dollars (see grievance) All remedies were exhausted.  
 Since the plaintiff has not been treated with proper  
 care for a temporary time he was given pain medication  
 up until his transfer to a separate facility upon arrival  
 back to Marion County Jail when requested to and made  
 notice to receive continued treatment he was from  
 then on denied his right to receive adequate care.  
 On date 6-19-24 Plaintiff Vasquez was placed on Segregation  
 for a period of 30 days during this time in which he was  
 deprived his opportunity to practice his religious freedom by  
 denied a bible he was also held inappropriately without  
 due process, write up, or chance to see a hearing's  
 Sergeant / Officer in order to contest issues

Plaintiff has since the day of his arrival at MCJ has been denied his right to adequate care, deliberate indifference and due process. Marion County Jail refuses to treat Vasquez with lidocaine muscle relaxer or any other treatment. The only thing he has is a knee brace which for a long period has been ripped due to a improper size issue that Marion County health services refuses to adjust. Plaintiff suffers from several mental health and is most supposed to be protected by the American Disabilities act. Currently he has been held at MCJ with no court date. Plaintiff Kirk A. Vasquez is a member of IBEW the International of electrical workers being that plaintiff is still suffering and has only recovered 50 percent his inability to function correctly will likely threaten his career indefinitely. As well on 6-12-24 jail staff injured right shoulder

Plaintiff Seeks injunctive relief, punitive damages, monetary and compensatory relief of 7 million, or no cap, by a grand jury. He wishes to sue all defendants in the professional and individual capacity.

Name: Kirk A. Vasquez  
SID# 16702646

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